

EXHIBIT A

1 UNITED STATES DISTRICT COURT
2 NORTH CAROLINA MIDDLE DISTRICT
3

4 MAXWELL KADEL, et al.,
5 Plaintiffs,
6 vs. Case No. 1:19-cv-00272-LCB-LPA
7 DALE FOLWELL, et al.,
8 Defendants.
9

10 THE DEPOSITION OF GEORGE R. BROWN, M.D.
11 September 23, 2021

12 **PORTIONS ATTORNEYS' EYES ONLY**

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19 Reported by:
20 PATRICIA A. NILSEN, RMR, CRR, CRC
21 Licensed Court Reporter 717 for the State of
22 Tennessee
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1 The deposition of GEORGE R. BROWN,
2 M.D., taken on behalf of the Defendants, pursuant
3 to Notice on September 23, 2021, beginning at
4 approximately 9:31 a.m. EST taken remotely.

5 This deposition is taken in
6 accordance with the terms and provisions of the
7 Federal Rules of Civil Procedure. All objections
8 are reserved except as to form, and all sides
9 stipulate to the swearing of the witness remotely.

10 The signature of the witness is
11 reserved.

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1 APPEARANCES (via Zoom)
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10 Videotaped By: STEVE CUMMINGS

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1 have some questions, but -- just a couple of
2 questions.

3 Q. Dr. Brown, are you licensed to practice
4 medicine in the state of North Carolina?

5 A. I am not.

6 Q. Prior to conducting a forensic interview
7 with the plaintiffs in this case, did you apply for
8 or receive a temporary license from the State of
9 North Carolina?

10 A. No, I did not, because I haven't practiced
11 medicine in the state of North Carolina.

12 Q. So it is -- it is your understanding that
13 your interview of the plaintiffs in this case does
14 not constitute the practice of medicine in
15 North Carolina?

16 MR. TISHYEVICH: Object to form, and
17 object to the extent it calls for a legal
18 conclusion.

19 A. I can -- I can state that it was made
20 clear to each of the plaintiffs prior to the onset
21 of the interviews that this was not the practice of
22 medicine, and no doctor-patient relationship would
23 be established by any further discussion that I had
24 with them if they choose to proceed.

25 Q. Did you seek or receive a signed consent

form from the plaintiffs prior to interviewing them?

3 A. I can't recall when I've ever gotten a
4 signed consent form to conduct an interview with a
5 voluntary, willing individual.

6 MR. KNEPPER: I have no further
7 questions.

13 (Recess)

17 EXAMINATION

18 BY MR. TISHYEVICH:

19 Q. Dr. Brown, good evening. I have just a
20 couple of questions for you.

21 Are some of the opinions that you're
22 offering in this case about the necessity, safety,
23 and effectiveness of various types of
24 gender-affirming treatment?

A. Yes, they are.